

Exhibit I

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VIA EMAIL
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April 12, 2016

Thomas C. Werner
Irell & Manella LLP
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Erin Alper
Associate
alper@fr.com
404 724 2848 direct

Re: *TiVo v. Samsung*, No. 2:15-cv-1503 (E.D. Tex.)

Dear Tom:

I am writing in response to your letter from earlier today regarding TiVo's insufficient infringement contentions. Suffice it to say, we disagree with TiVo's allegations and remain at an impasse.

You say that on the parties' March 25 meet and confer "Samsung could not explain what additional detail TiVo allegedly needed to add to its disclosures to satisfy Samsung." This is incorrect. The parties spoke for nearly an hour on this topic, and Samsung repeatedly explained its position, with which TiVo repeatedly disagreed.

You say "that Samsung abandoned the meet and confer process." This is incorrect. As you know, on our March 25 meet and confer, we decided the parties' lead and local counsel would continue the meet and confer process in an attempt to resolve the disputed issues. That is exactly what happened—the parties' local and local/lead counsel (Melissa Smith and Sam Baxter, respectively) have been conferring about the disputed issue for over a week.

You claim that "TiVo never heard anything further from Samsung regarding [TiVo's] proposal" that the parties "agree to a joint exchange, in which each party identified the claim elements of its own patents for which it anticipated relying on P.R. 3-1(g) to supplement with regard to source code." This is incorrect. In addition to continuing the meet and confer process, Samsung provided TiVo with a draft motion to compel on April 2, in which Samsung makes clear its position as to TiVo's proposal.

You claim that "on April 11, Samsung stated that it would file a motion attacking TiVo's infringement contentions unless TiVo unilaterally committed in writing to supplement its contentions." This is incorrect. As stated above, Samsung provided the draft motion to compel to TiVo on April 2—over a week ago—and advised that if the parties were

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unable to resolve the disputed issue, Samsung would file by April 8, last Friday. We received no substantive response, and on Monday, April 11—only after following up with TiVo once again—did we finally hear from TiVo that it would send Samsung a letter possibly resolving the disputed issues. Obviously, your letter of April 12 does not do so.

You say “TiVo has no interest in unnecessarily burdening the Court on this matter,” but your letter does nothing to resolve the parties’ disputed issue regarding the software elements in TiVo’s infringement contentions identified in Samsung’s draft motion to compel. TiVo neither commits to invoking P.R. 3-1(g), nor commits to amending its contentions to comply with P.R. 3-1(c).

As the parties remain at an impasse, Samsung will file its motion to compel today.

Respectfully,

A handwritten signature in black ink, appearing to read "Erin Alper", written in a cursive style.

Erin Alper

cc: Sam Baxter, Melissa Smith